

Exhibit A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----	X	
JULIETTE BRYANT,	:	
	:	
Plaintiff,	:	
	:	
v.	:	
	:	Index No. 1:19-cv-10479-ALC-DCF
DARREN K. INDYKE and RICHARD D.	:	
KAHN in their capacities as the executors of	:	
the ESTATE OF JEFFREY EDWARD	:	
EPSTEIN,	:	
	:	
Defendants.	:	
	:	
-----	X	

INITIAL DISCLOSURES OF DEFENDANTS DARREN K. INDYKE AND RICHARD D. KAHN, CO-EXECUTORS OF THE ESTATE OF JEFFREY E. EPSTEIN

Pursuant to Fed. R. Civ. P. 26(a)(1), Defendants Darren K. Indyke and Richard D. Kahn, Co-Executors of the Estate of Jeffrey E. Epstein (together, the “Co-Executors”), make the following initial disclosures to Plaintiff Juliette Bryant. These disclosures are based on the information reasonably available to the Co-Executors at present. The Co-Executors reserve the right to supplement or modify these disclosures if additional, responsive information is obtained.

The Co-Executors provide this information without any concession, agreement, admission or waiver of any ultimate determination of relevance or admissibility of particular information or testimony for any purpose. The Co-Executors reserve the right to, at trial, call any witness and present any exhibit or other evidence not listed here but identified through discovery or investigation during this action. The Co-Executors do not waive their rights to object to the production of any document or tangible thing based on the attorney-client privilege, the work-product doctrine, relevance, undue burden or any other valid objection.

INITIAL DISCLOSURES

Rule 26(a)(1)(A)

i. the name, and if known, the address and telephone number of each individual likely to have discoverable information – along with the subjects of that information – that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment;

Response:

1. Plaintiff. Plaintiff is likely to have discoverable information concerning Jeffrey E. Epstein's alleged conduct and Plaintiff's claimed damages, which the Co-Executors may use to support their defenses.
2. Sven Stromnes. Mr. Stromnes is likely to have discoverable information concerning Jeffrey E. Epstein's alleged conduct and Plaintiff's claimed damages, which the Co-Executors may use to support their defenses. Upon information and belief, Mr. Stromnes is located in South Africa.

ii. a copy – or a description by category and location – of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment;

Response: At present, the Co-Executors are not aware of any such documents, electronically stored information, and tangible things.

iii. a computation of each category of damages claimed by the disclosing party – who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered; and

Response: The Co-Executors do not claim damages.

iv. for inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

Response: At present, the Co-Executors are unaware of any such insurance agreement.

Dated: New York, New York
January 23, 2020

Respectfully submitted,

TROUTMAN SANDERS LLP
875 Third Avenue
New York, New York 10022

By: /s/ Bennet J. Moskowitz
Bennet J. Moskowitz

*Attorneys for Defendants Darren K. Indyke and
Richard D. Kahn, Co-Executors of the Estate of
Jeffrey E. Epstein*

CERTIFICATE OF SERVICE

The undersigned certifies that on January 23, 2020, I served a copy of the foregoing Initial Disclosures of Defendants Darren K. Indyke and Richard D. Kahn, Co-Executors of the Estate of Jeffrey E. Epstein, made pursuant to Fed. R. Civ. P. 26(a)(1), by sending them by email to:

Sigrid McCawley
Boies, Schiller & Flexner LLP
401 E. Las Olas Blvd. Suite 1200
Fort Lauderdale, FL, 33301
(954)-377-4223
Email: smccawley@bsflp.com

s/Bennet J. Moskowitz